The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

Zango, Inc., f/k/a 180solutions, Inc., a Washington corporation, a/k/a MetricsDirect,

Plaintiff,

v.

Internet Brands, Inc., a Delaware Corporation d/b/a Cars Direct,

Defendant.

No. CV 7-506 RSL

JOINT STATUS REPORT AND DISCOVERY PLAN

The parties to this action submit the following Joint Status Report & Discovery Plan required by the Court's Order. The parties respond to the Court's specific inquiries as follows:

1. Plaintiff Zango, Inc. provides internet marketing services, including advertising services purchased by Defendant Internet Brands, Inc. that delivered advertisements (by opening a new browser window directly to Internet Brands' designated web site) to internet users. Zango claims that Internet Brands failed to pay for all of the services provided and breached its contractual agreements with Zango. Internet Brands denies that it breached agreements with Zango or that it owes money to Zango. Internet Brands has counterclaimed, alleging that Zango improperly charged Internet Brands for advertisements directed to non-U.S. internet users. Internet Brands seeks damages, including a refund of the money paid for the non-U.S. adverting it paid for. Zango denies these allegations and denies that it owes money to Internet Brands.

2. The parties agree this case would benefit from mediation.

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3. Mediation of this case should occur after the completion of discovery.

4. The deadline for joining additional parties should be August 1, 2007.

5. A. All parties participated in a Fed R. Civ. P. 26(f) conference on June 13, 2007. All parties have served initial disclosures.

B. Discovery is needed on all liability and damages issues.

C. There is no need to change any of the limitations imposed by the Federal and Local Civil Rules of Procedure.

D. The current limitations on discovery and the initial disclosure requirements in Federal Court will help minimize discovery expenses.

E. At this time no orders should be entered by the Court under Fed. R. Civ. P. 26(c) or under CR 16(b) and (c).

6. All discovery in this action should be completed by February 1, 2008.

7. The parties do not agree to try this case before a U.S. Magistrate Judge.

8. The parties do not believe bifurcation of the issues in this case would be helpful.

9. The parties request that they be required to comply with CR 16(i)(5) [list of witnesses] and (6) [list of exhibits] and CR 16(j) [review of exhibits]. For the sake of economy, the parties request that they not be required to follow CR 16(e), (h), (l), and 16.1 or the remaining subparts of CR 16(i).

10. The parties presently have no suggestions for shortening or simplifying the case.

11. This case will be ready for trial by June 2, 2008.

12. It is expected that a jury will be demanded by Internet Brands.

13. Trial of this matter will require five (5) court days.

14. Trial counsel for the parties are identified as follows:

For plaintiff: Daniel P. Harris and Charles P. Moure, HARRIS & MOURE pllc, 720 Olive Way, Suite 1000, Seattle, WA 98101, (206) 224-5657 and fax (206) 224-5659.

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For defendant: Chris Youtz, SIRIANNI YOUTZ MEIER & SPOONEMORE, 719 Second Avenue, Suite 1100, Seattle, WA 98104, Tel. 206-223-0303; Fax 206-223-0246

15. There are no service of process issues.

16. None of the parties wish to participate in a scheduling conference prior to a scheduling order being entered in this case.

DATED this Thursday, June 14, 2007.

HARRIS & MOURE, pllc

/s Charles P. Moure
By___________________________________
Daniel P. Harris, WSBA # 16778
Charles P. Moure, WSBA # 23701

SIRIANNI YOUTZ MEIER & SPOONEMORE,

By____/s Chris R. Youtz______________________________
Chris R. Youtz, WSBA #7786

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